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August 5, 2025

Hon. Margo K. Brodie  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

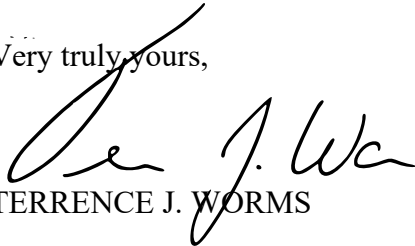
Re: *Wang v. Chung Fat Supermarket Inc. et al.*, Case No. 1:25-cv-02236-MKB-PK

I am the attorney of record for the Defendant Zhi Liang Chen. I echo each and every claim made by the Corporate Defendant's Letter dated August 4, 2025 (Document 25) as if fully set forth below. On behalf of Defendant Chen I would further add that Mr. Chen does not meet any definition of employer under any statutory scheme, including, but not limited to New York Labor Law, Wage Theft Prevention Act, New York State Human Rights Law and New York City Human Right Law among the host of other issues presented with this filing.

As I also anticipate filing a *Motion to Dismiss*, I join in the application for a pre-motion conference. I hope this will then move these preliminary matters as expeditiously as possible.

My apologies for the late entry as I was travelling. I had initially been informed by my client that he had not been served with the Complaint. Upon my return, I reviewed the matter on Pacer to confirm there was an *Affidavit of Service* on Chen under Document 19.

Very truly yours,

  
TERRENCE J. WORMS